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## *Attorneys for Defendant Life Flight Network*

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

JOHN KRILL.

**Plaintiff,**

V.

LIFE FLIGHT NETWORK LLC and JOHN  
DOE EMPLOYEES I – V of LIFE FLIGHT  
NETWORK, LLC

#### Defendants.

Case No. 2:22-cv-00057

**DECLARATION OF W. GREGORY  
LOCKWOOD IN SUPPORT OF NOTICE  
OF REMOVAL**

I, W. Gregory Lockwood declare under penalty of perjury that the foregoing is true and correct:

1. I am the attorney of record for Life Flight Network LLC (“Life Flight”) in this matter. I make this declaration in support of Life Flight’s notice of removal.

2. Based on my investigation and information obtained in pre-litigation matters in this case, Mr. Krill is a citizen of the State of Wyoming, residing in Jackson, Teton County. This belief is partially based upon a Westlaw Public Records PeopleMap Search, which could be

1 provided to the Court, but has been omitted because of the larger amount of personal information  
2 included in it.

3       3. Based on my experience as a lawyer, claims like Mr. Krill's, based on alleged  
4 permanent disability exceed \$75,000 in value.

5       4. Past and future medical expense alone could account for more than \$75,000.00 in  
6 claimed damages.

7       5. Based on the types of damages alleged, Plaintiff's claims exceed the threshold for  
8 diversity jurisdiction.

9  
10      **I HEREBY DECLARE THAT THE ABOVE STATEMENT IS TRUE TO THE**  
11      **BEST OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND IT IS MADE**  
12      **FOR USE AS EVIDENCE IN COURT AND IS SUBJECT TO PENALTY FOR**  
13      **PERJURY.**

14  
15      Executed on: April 4, 2022

GORDON REES SCULLY MANSUKHANI, LLP

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17      By: s/ W. Gregory Lockwood  
18                   W. Gregory Lockwood, WSBA No. 52232  
19                   [wglockwood@grsm.com](mailto:wglockwood@grsm.com)  
                 Attorneys for Life Flight Network LLC